

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**PENDLETON DIVISION**

WAIBEL RANCHES, LLC, an Oregon Limited  
Liability Company, and WAIBEL PROPERTIES,  
LLC, an Oregon Limited Liability Company,

Plaintiffs,

vs.

UNITED STATES OF AMERICA,

Defendant.

CASE NO: 2:15-CV-2071

**PLAINTIFFS' UNOPPOSED MOTION  
FOR AN EXTENSION ON DEADLINE  
TO FILE FRCD 72(B)(2) OBJECTIONS**

COMES NOW, Plaintiffs, Waibel Ranches, LLC and Waibel Properties, LLC, by and through their attorney of record, Edward P. Fitch of Fitch and Neary, P.C., and hereby respectfully moves this Court for an Order allowing an extension of the deadline for Plaintiffs to file their Objections to the Judge's findings and recommendations issued by the Court in regard to Defendant's Motion to Dismiss until May 25, 2022. These findings were submitted on April 14, 2022.

The reason for this Motion is that counsel for Plaintiff's, Edward P. Fitch, will be in Europe starting April 19, 2022, to May 09, 2022. This extension will allow him adequate time to prepare and file the necessary objections to the findings and recommendations issued by the Court in regard to Defendant's Motion to Dismiss.

///

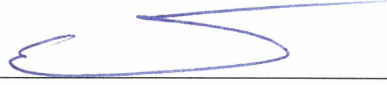
///

1 Upon conferral, counsel for Defendant, Sean E. Martin, does not object to this Motion. It  
2 should be noted that Sean E. Martin will be out of the office until April 20, 2022. This Motion is  
3 made in good faith and not for purposed of delay.  
4

5 Dated this 15<sup>th</sup> day of April 2022.

6 FITCH & NEARY, P.C.

7  
8 By:

  
9 Edward P. Fitch, OSB No. 782026  
10 *Of Attorneys for Plaintiffs*  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing *Plaintiff's Unopposed Motion for Extension of Time to File FRCD 72(b)(2) Objections* on:

U.S. Attorney's Office  
ATTN: Mr. Sean E. Martin, Acting U.S. District Attorney of Oregon  
E: sean.martin@usdoj.gov  
Attorney for Defendant

by the following indicated method or methods:

\_\_\_\_\_ by **MAILING** a full, true, and correct copy thereof in a sealed first-class postage-prepaid envelope, addressed to the attorney(s) listed above, and deposited in the United States Postal Service at Redmond, Oregon, on the date set forth below.

  X   by **EMAILING** a full, true, and correct copy thereof addressed to the attorney(s) listed above, at the email address listed above, on the date set forth below.

\_\_\_\_\_ by **FAXING** a full, true, and correct copy thereof to the attorney(s) at the fax number(s) shown above, on the date set forth below.

\_\_\_\_\_ by **HAND-DELIVERING** a full, true, and correct copy thereof to the attorney(s) listed above on the date set forth below.

\_\_\_\_\_ by **SENDING VIA OVERNIGHT DELIVERY** a full, true, and correct copy thereof in a sealed, postage-prepaid envelope, addressed to the attorney(s) listed above, on the date set forth below.

Dated this 15th day of April 2022.

FITCH & NEARY, P.C.

By: /s/ Edward P. Fitch  
Edward P. Fitch, OSB No. 782026  
Of Attorneys for Plaintiff